

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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April 23, 2024

**VIA ECF**

The Hon. Joseph A. Marutollo, U.S.M.J.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Oyenuga v. Presidential Security Services LLC et al*  
**Case No.: 1:22-cv-04972-DG-RER**

Dear Honorable Magistrate Judge Marutollo:

This law firm represents Plaintiffs Oludare Oyenuga and Janiya Preston (together, the “Plaintiffs”) in the above referenced matter.

Pursuant to Your Honor’s Individual Motion Rules, this letter respectfully serves to request an extension of time: (i) to serve Individual Defendant Ismail Qadar (the “Individual Defendant”); and (ii) to file a letter motion for alternative service on the Individual Defendant, to, through and including, May 17, 2024.

This is the first request of its kind. If granted, this request would not affect any other Court scheduled deadlines.

The basis of this request is that Plaintiffs wish to exhaust their efforts to serve the Individual Defendant, before renewing their application to serve the Individual Defendant via alternative means.

In light of the foregoing, it is respectfully requested that the Court grant an extension of time: (i) to serve Individual Defendant Ismail Qadar (the “Individual Defendant”); and (ii) to file a letter motion for alternative service on the Individual Defendant, to, through and including, May 17, 2024.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
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VIA ECF: All Counsel